

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Sara M. Keenan
Debtor

Sara M. Keenan
Movant
v.

Rushmore Loan Management
Services, LLC as Servicer for U.S.
Bank Trust National Association, as
Trustee of the LB-Cabana Series IV
Trust
Scott F. Waterman - Trustee
Respondents

Case No.: 20-14061-amc

Chapter: 13

Judge: Ashely M. Chan

Hearing Date:
June 14, 2023, at 11:00 am

**SETTLEMENT STIPULATION RESOLVING CREDITOR, RUSHMORE LOAN
MANAGEMENT SERVICES, LLC AS SERVICER FOR U.S. BANK TRUST NATIONAL
ASSOCIATION, AS TRUSTEE OF THE LB-CABANA SERIES IV TRUST'S LIMITED
OBJECTION TO DEBTOR'S MOTION TO SELL PROPERTY**

AND NOW, upon the Motion of Debtor, Sara M. Keenan (the "Debtor") for Sale of the Property located at 8716 Macon Street, Philadelphia, PA 19152 (the "Property"), and the Limited Objection of Creditor, Rushmore Loan Management Services, LLC as Servicer for U.S. Bank Trust National Association, as Trustee of the LB-Cabana Series IV Trust (the "Creditor"); it is hereby agreed as follows:

1. Debtor has entered into an Agreement of Sale for the sale of the Property for the amount of \$225,000.00.
2. The current payoff amount to pay Creditor's loan in full is approximately \$97,180.43, good through May 8, 2023. Prior to closing, Creditor shall provide an update payoff to Counsel for Debtor.
3. Creditor's Claim shall be paid in full from the proceeds of the sale of the Property,

absent further Order of the Court.

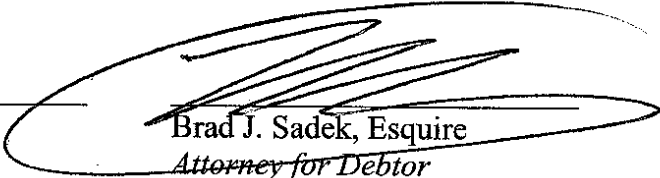
4. The parties request that this Honorable Court approve this Stipulation.

Dated: May 16, 2023

/s/ Lauren M. Moyer

Lauren M. Moyer, Esquire
Friedman Vartolo, LLP
Attorney for Creditor

Dated: 5/15/23



Brad J. Sadek, Esquire
Attorney for Debtor

Dated: May 18, 2023

/s/ Ann E. Swartz, for

Scott F. Waterman
Chapter 13 Trustee